

DENNIS M. PRINCE  
Nevada Bar No. 5092  
KEVIN T. STRONG  
Nevada Bar No. 12107  
**PRINCE LAW GROUP**  
10801 W. Charleston Boulevard  
Suite 560  
Las Vegas, NV 89135  
Tel: (702) 534-7600  
Fax: (702) 534-7601  
Email: [eservice@thedplg.com](mailto:eservice@thedplg.com)

-And-

JUSTIN L. DEWEY  
Nevada Bar No. 14508  
**TINGEY & TINGEY**  
817 S. Main Street  
Las Vegas, NV 89101  
Tel: (702) 333-0000  
Fax: (702) 333-0001

Attorneys for Plaintiff  
*Maria Villarreal-Rodriguez*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARIA VILLARREAL-RODRIGUEZ,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY,

Defendant.

Case No.: 2:22-cv-00072-JAD-DJA

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR  
PLAINTIFF TO FILE HER REPLY  
TO DEFENDANT'S RESPONSE TO  
PLAINTIFF'S MOTION TO REMAND**

**(First Request)**

ECF No. 12

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff MARIA VILLARREAL-RODRIGUEZ, through her counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP and Justin L. Dewey of TINGEY & TINGEY, and Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, through its counsel of record, Robert W. Freeman, Cheryl A. Grames, and Shirley Foster of LEWIS BRISBOIS BISGAARD & SMITH LLP, that the deadline for Plaintiff to file her Reply to Defendant's Response to Plaintiff's Motion to Remand shall be extended by



ten days, from March 11, 2022 to March 21, 2022. The Motion was filed on February 14, 2022 and the hearing on the Motion is currently set for April 5, 2022. This Stipulation is submitted in accordance with LR IA 6-1.

The parties respectfully request an extension of the briefing schedule as Plaintiff's undersigned counsel of record spent some time out of the office this week to deal with a personal matter. This brief extension of time will allow Plaintiff the requisite time to fully address the arguments Defendant sets forth in its Opposition to assist this Court in its ultimate decision. Accordingly, the parties respectfully request this Court to approve the foregoing Stipulation. Their requested extension is not made in bad faith or to unnecessarily delay these proceedings.

DATED this 10th day of March, 2022.

DATED this 10th day of March, 2022.

**PRINCE LAW GROUP**

**LEWIS BRISBOIS BISGAARD &  
SMITH LLP**

/s/ Kevin T. Strong

/s/ Cheryl A. Grames

DENNIS M. PRINCE  
Nevada Bar No. 5092  
KEVIN T. STRONG  
Nevada Bar No. 12107  
10801 W. Charleston Boulevard  
Suite 560  
Las Vegas, Nevada 89135  
-AND-  
JUSTIN L. DEWEY  
Nevada Bar No. 14508  
**TINGEY & TINGEY**  
817 S. Main Street  
Las Vegas, NV 89101  
Tel: (702) 333-0000  
Fax: (702) 333-0001  
Attorneys for Plaintiff  
*Maria Villarreal-Rodriguez*

ROBERT W. FREEMAN  
Nevada Bar No. 3062  
CHERYL A. GRAMES  
Nevada Bar No. 12752  
SHIRLEY FOSTER  
Nevada Bar No. 8069  
6385 S. Rainbow Boulevard  
Suite 600  
Las Vegas, Nevada 89118  
Attorneys for Defendant  
*State Farm Mutual Automobile Insurance  
Company*

**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: March 14, 2022